

November 1, 2018

BY ECF

The Honorable Allyne R. Ross
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Semyon Grinblat v. Nor Cooper Service Center Inc. and BP Products
North America Inc.*, Case No. 1:18-cv-05000-ARR-RML

Dear Judge Ross:

I am counsel for defendant BP Products North America Inc. (“BP”) in the above-referenced action. I write pursuant to Paragraph I(E) of Your Honor’s Individual Practices and Rules to request a 24-day extension of BP’s deadline to respond to the complaint, from November 2, 2018, to November 26, 2018. I have spoken with counsel for defendant Nor Cooper Service Center Inc. (“Nor Cooper”), and Nor Cooper joins in this request.

The parties have been engaged in discussions related to settlement of this action. The additional time is requested to allow the parties to continue those negotiations in an attempt to resolve the action before a response to the complaint is due.

This is defendants’ second request for an extension. Plaintiff has consented to this request. Defendants’ original response deadline was October 3, 2018. The Court granted defendants’ request to extend their response deadline by thirty days to November 2, 2018. There are presently no scheduled conferences in this action.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Sara L. Shudofsky

cc: Michael Grinblat, Esq. (by ECF)
Adam Ford, Esq. (by email)
Nor Cooper Service Center Inc. (by regular mail)